

Center for Mass Media Research

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September 11, 1992

Anthony Pharr
OC/UCC Washington Office
2000 M. St., N.W., Suite 400
Washington, D.C. 20036

Re: NPRM on the "Changing Video Marketplace"

Dear Mr. Pharr:

You have asked that I review the U.C.C. comments to M.M. Docket 91-221, along with the NPRM itself and comments of the National Association of Broadcasters specifically directed at your submission. You were particularly interested in my opinion, as a social scientist and working survey researcher, of Commission and N.A.B. criticisms of a five-market study of trends in public service broadcasting included in your November 21 submission to the Commission.

It appears odd on the face of it for the Commission to call for additional studies, and then seem to be prepared to proceed without any, and for the N.A.B. to decline to provide any data of its own. Its gambit, it seems to me, is to proceed under the assumption that Commission suspicions of your study will be reinforced if they appear to confirm them through their faint dismissal of your data.

Let me address the criticism of your study raised by both the Commission and the N.A.B.: sample size. It is disingenuous for any researcher to use sample size alone as a basis for criticism of your study. Anyone who knows anything about survey research would know that even a "sample" of all 200 markets would be unlikely to reveal statistically-significant differences. That is, what the NAB calls the "margin for error" (in an imprecise use of the term) would undoubtedly be large enough, even if all 200 markets were included, to obscure the differences you found.

It is important here to keep in mind a distinction between statistically-significant (a precise term of art from the field of social measurement) findings, and those which are—simply—"significant" in a social or policy sense. To say that something does not satisfy the former criterion should not and cannot be taken to imply that it therefore does not satisfy the latter, and the case we have here is an excellent example of why this is so. It is clear that, in the markets included in your study, there are significant differences between individually-owned and group-owned stations in their provision of public-service programming.


What this means is that, in this case, "error margins" alone are an irrelevant criterion by which to judge your study. The differences you found are significant in social and policy terms, yet are—for technical reasons—too small to be statistically "significant."

The point of "error margins," as any researcher knows, is generalizability. That is, how sure can we be that a given population is representative of the total group we are interested in, and how sure can we be that a given finding was not the result of chance? You are unable to establish generalizability ("external validity") statistically given your sample size.

So, the question of validation or generalizability must rest on an argument that your choice of markets is representative of others based on judgement, experience and logic. Criticisms should be made on the same basis. I see nothing intuitively wrong with the markets included in your study. They seem to represent some reasonable geographic spread, as well as some differentiation in size, number of stations, mix of network and independents, etc.

Until there is a serious analysis of why these five markets might be so unusual as to be non-representative of the trends as a whole, it is my opinion that the findings of your study stand as the only empirical data available. And, their force and effect is to suggest that the notion that relaxation of ownership standards could have a positive or even neutral effect on provision of local public service—is seriously flawed reasoning.

Sincerely

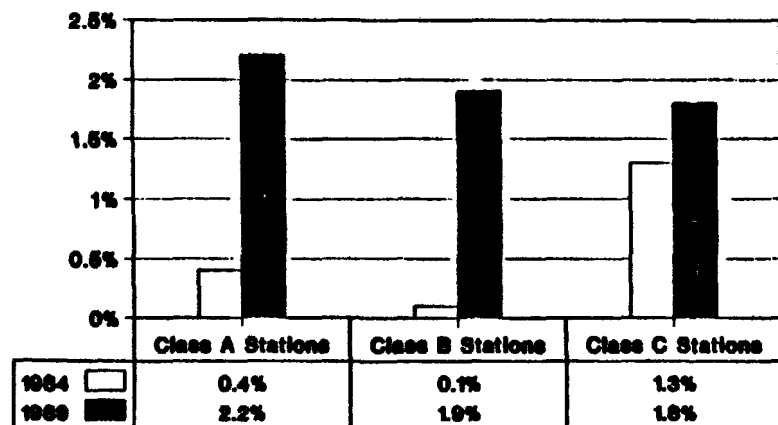


Stewart M. Hoover, Ph.D.
Associate Professor

EXHIBIT II

A

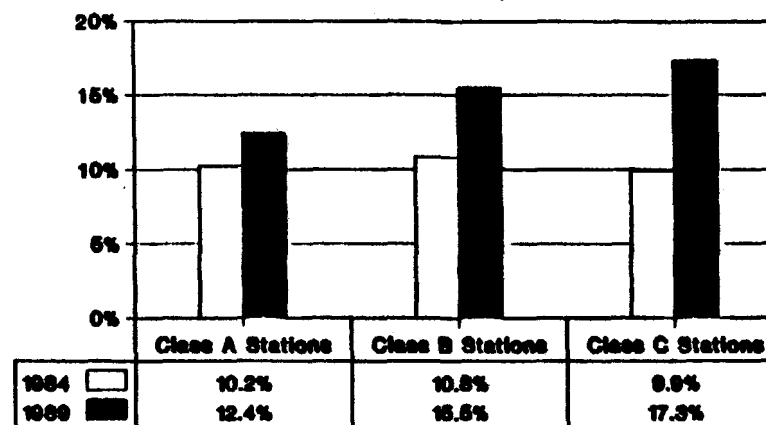
COMPARISON OF LOCAL PUBLIC AFFAIRS BY OWNERSHIP CHARACTERISTICS



A = individually owned in '84 and '89.
B = ownership smaller in '89 than in '84.
C = ownership larger in '89 than in '84.

B

COMPARISON OF NATIONAL PUBLIC AFFAIRS BY OWNERSHIP CHARACTERISTICS

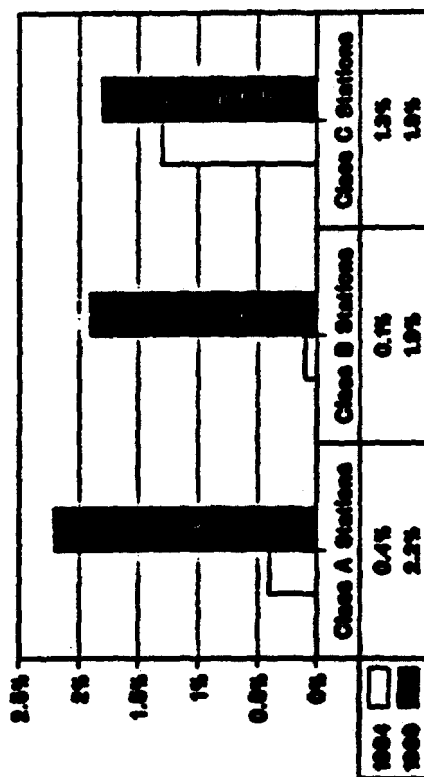


A = individually owned in '84 and '89.
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EXHIBIT II CONT'D.

A

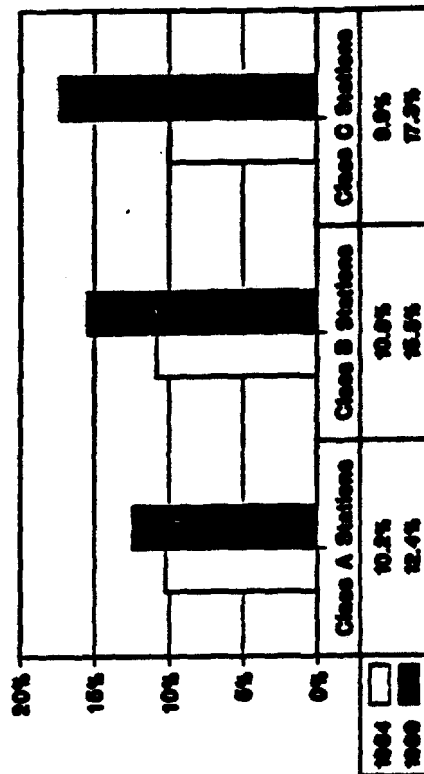
COMPARISON OF LOCAL PUBLIC AFFAIRS BY OWNERSHIP CHARACTERISTICS



A = Individually owned in '64 and '68.
B = ownership smaller in '68 than in '64.
C = ownership larger in '68 than in '64.

B

COMPARISON OF NATIONAL PUBLIC AFFAIRS BY OWNERSHIP CHARACTERISTICS



A = Individually owned in '64 and '68.
B = ownership smaller in '68 than in '64.
C = ownership larger in '68 than in '64.